

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Rekor Systems, Inc.

Plaintiff,

v.

Suzanne Loughlin, Harry Rhulen and
James Satterfield,

Defendants

And

CrisisRisk Strategies, LLC

Additional Plaintiff
On Counterclaims

v.

Robert A. Berman, Eyal Hen,
James K. McCarthy, Paul A. de Bary,
Glenn Goord, Christine Harada, David
Hanlon, Richard Nathan, Steven
D. Croxton, Firestorm Solutions, LLC,
and Firestorm Franchising, LLC

Additional Defendants
On Counterclaims

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No. 19-cv-7767 (LJL)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon (a) Defendants' Memorandum of Law In Support of Their Motion For Judgment on the Pleadings, dated April 26, 2020; and (b) the Declaration of Robert C. Boneberg, dated April 26, 2020, and the exhibits thereto; and (c) all prior proceedings and matters of record in this action, Defendants Suzanne Loughlin, Harry Rhulen and James Satterfield ("Defendants"), by and through their undersigned counsel, will move this Court before the Honorable Lewis J. Liman, United States District Judge, Southern District of New

York, at the United States Courthouse, 500 Pearl Street, New York, New York, courtroom 15C, at a time and date to be determined by the Court, for an order pursuant to the Federal Rule of Civil 12(c) (i) granting Defendants partial judgment on the pleadings, and dismissing plaintiff's claim for rescission, with prejudice; and (ii) for such other and further relief as to this Court seems just and proper.

Dated: April 26, 2020

Respectfully submitted,



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And

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